

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON NON-REVISION PTO 298
(ELECTION WAVE) CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
NICOLETTE SIGRID HORBACH, M.D. FOR
NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply filed in relation to Nicolette Sigrid Horbach for Ethicon Wave 1, Dkt. 2044 (motion), Dkt. 2045 (memorandum in support) and Dkt. 2235 (reply). Plaintiffs respectfully request that the Court exclude Nicolette Sigrid Horbach's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Non-Revision PTO 298 (Election Wave) cases identified in Exhibit A attached hereto.

Dated: December 12, 2018

Respectfully submitted,

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EXHIBIT A

Carder, Dolores	2:13-cv-22693
Crosswhite, Thelma	2:15-cv-13394
Cyrus, Sandra	2:12-cv-01283
McCaig, D. Carlene	2:17-cv-04427
Meszaros, Mary	2:12-cv-09246
Neil, Donna	2:16-cv-03562
Oliveira, Lervon R.	2:12-cv-09062
Simpson, Ramona	2:14-cv-00051
Mary Ann Dickson, personal representative of estate of Smith, Vada (deceased)	2:15-cv-02800
Willes, Lynne	2:14-cv-29092
Wormsley, Janet	2:16-cv-08589

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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